

UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

IN RE: § Chapter 11 Subchapter V
ERIC RALLS¹ § Case No. 24-60504-JPS-11
DEBTOR § JOINTLY ADMINISTERED

AMENDED MOTION TO WITHDRAW AS ATTORNEY OF RECORD

YOUR RIGHTS MAY BE AFFECTED BY THE RELIEF SOUGHT IN THIS PLEADING. YOU SHOULD READ THIS PLEADING CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY, IF YOU HAVE ONE, IN THIS BANKRUPTCY CASE. IF YOU OPPOSE THE RELIEF SOUGHT BY THIS PLEADING, YOU MUST FILE A WRITTEN OBJECTION, EXPLAINING THE FACTUAL AND/OR LEGAL BASIS FOR OPPOSING THE RELIEF.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING BEFORE CLOSE OF BUSINESS ON JUNE 4, 2025 WHICH IS WITHIN TWENTYONE (21) DAYS FROM THE DATE OF SERVICE SHOWN IN THE CERTIFICATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION.

IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING WITH APPROPRIATE NOTICE. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

¹ The last four digits of the Debtor's Social Security numbers are (0447).

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, Counsel for Joint Administered Debtors EarthSnap, Inc., Eric Ralls, and (collectively known as “Debtors”) would state the following in support thereof:

1. The Debtors have advised the Attorney that new counsel has been retained on this matter. This counsel has filed pleadings that my law firm and I are responsible for any adverse decision rendered against the Debtors. As a result, the legal representation has been rendered as a patent conflict.
3. The Attorney is therefore seeking permission to withdraw as counsel for the Debtors and requests to be relieved of any and all future professional obligations, responsibilities, and duties to the Debtors.

PRAYER

WHEREFORE, counsel respectfully requests that this Court enter an Order granting the Amended Motion to Withdraw as Counsel for the Debtors to withdraw as attorney of record and for such other and further relief to which they may show themselves to be entitled.

Date: May 14th, 2025.

Respectfully submitted,

WILEY LAW GROUP, PLLC

/s/ Kevin S. Wiley, Sr.
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EarthSnap, Inc. and Eric Ralls.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and the foregoing amended document has been served on all counsel of record via the Court's ECF system on May 14th, 2025.

/s/Kevin S. Wiley, Sr.